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14	Attorneys for Defendant Meta Platforms, Inc.	
15	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
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19 20	MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated,	Case No. 3:20-cv-08570-JD
	Plaintiffs,	DECLARATION OF SONAL N. MEHTA
21	v.	IN SUPPORT OF MOTION TO CONTINUE HEARING ON DEFENDANT
22 23	META PLATFORMS, INC., a Delaware	META PLATFORMS, INC.'S MOTION TO DISMISS PURSUANT TO LOCAL
24	Corporation headquartered in California,	RULES 6-3 & 7-7(b)
25	Defendant.	Judge: Hon. James Donato
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I, Sonal N. Mehta, declare as follows:

- 1. I am a member of the California Bar and am admitted to practice before this Court. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Meta Platforms, Inc. in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
- 2. On March 21, 2022, Meta filed a Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint ("Motion to Dismiss"), and noticed a hearing on that motion for May 26, 2022 at 10:00 AM.
- 3. Also on March 21, 2022, the Judicial Panel on Multidistrict Litigation ("JPML") issued a Conditional Transfer Order with Simultaneous Separation and Remand ("Conditional Transfer Order"), transferring Advertisers' First Amended Complaint to the multidistrict litigation *In re: Google Digital Advertising Antitrust Litigation*, MDL No. 3010 (J.P.M.L.). *Id.* at ECF No. 169.
- 4. On April 12, 2022, Advertiser Plaintiffs filed a Motion to Vacate Conditional Transfer Order ("Motion to Vacate"). *Id.* at ECF No. 186. The JPML set the matter for its May 26, 2022 hearing session. *Id.* at ECF No. 178.
- 5. The JPML has since designated Advertisers' Motion to Vacate "for consideration without oral argument." *Id.* at ECF No. 189. Meta expects that the JPML will resolve the Motion to Vacate close in time to its previously scheduled May 26, 2022 hearing.
- 6. Meta requests that the Court continue the hearing on its Motion to Dismiss from Thursday, May 26, 2022 at 10:00 AM, to Thursday, June 23, 2022 at 10:00 AM or thereafter to give the JPML time to resolve the pending Motion to Vacate before the Court and parties expend resources preparing for the hearing.
- 7. In addition, Meta requests that the hearing date not be reset for a Thursday motion calendar between May 26 and June 23 because I, Defendant's lead counsel expect to argue the motion and have a previously booked non-refundable international family travel scheduled through June 15.

1	8. On April 27, 2022, my colleague emailed counsel for Advertiser Plaintiffs, asking		
2	that they stipulate to the date change. That same day, Mr. Bathaee, lead counsel for Advertiser		
3	Plainitffs, responded by email: "We will not so stipulate, and we would oppose such a motion."		
4	9. The parties have previously stipulated to time modifications to the briefing		
5	schedules for the Motion to Dismiss. The Court has also adjusted the deadline for numerous		
6	discovery briefs, hearings, case management conferences, and other filings during the pendency		
7	of this litigation. The proposed change to the date of the hearing will not alter the date of any		
8	other event or deadline already fixed by Court order.		
9	10. Meta does not ask the Court to move this hearing date for the purpose of delay,		
10	and doing so will not prejudice any party, as discovery will continue to proceed in parallel to the		
11	Court's consideration of Meta's Motion to Dismiss.		
12	I declare under penalty of perjury under the laws of the United States of America that the		
13	foregoing is true and correct.		
14	Executed on May 3, 2022.		
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16	By: /s/ Sonal N. Mehta		
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